

1 RENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
MONIQUE KIRTLEY  
3 Assistant Federal Public Defender  
411 E. Bonneville, Ste. 250  
4 Las Vegas, Nevada 89101  
(702) 388-6577/Phone  
5 (702) 388-6261/Fax  
Monique\_Kirtley@fd.org  
6

7 Attorney for Zachary Thomas Shear

8  
9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 ZACHARY THOMAS SHEAR,

15 Defendant.  
16  
17  
18  
19  
20

Case Nos.

2:13-cr-00150-JCM-VCF  
2:17-cr-0024-APG-NJK

**UNOPPOSED MOTION TO**  
**CONSOLIDATE REVOCATION**  
**HEARINGS FOR THE LIMITED**  
**PURPOSES OF SUPERVISED**  
**RELEASE HEARING AND**  
**SENTENCING**

(First Request)

21 Defendant, Zachary Thomas Shear, by and through his attorney of record, hereby files  
22 this Unopposed Motion to Consolidate the Revocation Hearings in case number 2:13-cr-0150-  
23 JCM-VCF and case number 2:17-cr-024-APG-NJK for adjudication of the Petitions for  
24 Warrant for Offender Under Supervision and concurrent service of any sentence imposed.  
25 Counsel have conferred. The United States does not oppose this motion.

26 ///

1 The revocation proceedings in both matters are based on substantially similar conditions  
2 of supervision and allegations of violations. Consolidation of the revocation proceedings in  
3 these matters and imposition a concurrent sentence would serve the interest of justice, conserve  
4 government resources and avoid redundant presentation of matters in separate hearings.  
5 Defendant Shear requests that the matter be heard in case number 2:17-cr-0024-APG-NJK,  
6 currently scheduled for revocation hearing on August 10, 2018.

7 DATED this 9<sup>th</sup> day of August, 2018.

8  
9 RENE L. VALLADARES  
Federal Public Defender

DAYLE ELIESON  
United States Attorney

10  
11 */s/ Monique Kirtley*  
12 By \_\_\_\_\_  
13 MONIQUE KIRTLEY  
Assistant Federal Public Defender

*/s/ Daniel J. Cowhig*  
By \_\_\_\_\_  
DANIEL J. COWHIG  
Assistant United States Attorney

14  
15  
16  
17 IT IS SO ORDERED this August 10<sup>th</sup>, 2018

18  
19   
20 \_\_\_\_\_  
UNITED STATES DISTRICT COURT JUDGE